STATE OF MISSOURI

Matt Blunt, Governor • Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

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September 29, 2006

Ms. Jamie Bernard-Drakey
U.S. EPA, Region VII
901 North 5th Street
Kansas City, KS 66101

Dear Ms. Bernard-Drakey:

The Missouri Department of Natural Resources' (the department), Hazardous Waste Program's Site Assessment Unit (SAU) has completed for the Pre-Remeidal portion of the Superfund Consolidated Agreement V997381-04, Pre-CERCLIS Site Screenings or Site Reassessments reports on the 15 St. Louis lead and zinc smelters and on the Malott/Wunderlich Wells and Harke Property sites. Further action under CERCLA is not being recommended for any of these sites. Copies of these reports are enclosed.

The department's SAU has also completed Site Reassessment (SR) Reports for former Mono Manufacturing and the Missouri Air National Guard sites and a Site Inspection (SI) Report for the Springfield/Branson Regional Airport site in Greene County. These sites were investigated in association with the Northwest Springfield Groundwater contaminant plume that consists of volatile organic compounds (VOCs), specifically trichloroethylene (TCE) and its degradation products. These contaminants have been documented at the Litton Systems site, which is currently undergoing remediation activities under the oversight of the department's Cooperative Program for VOC and heavy metal contamination in the subsurface soil and groundwater. In 2003, these facilities, along with other facilities in the Northwest Springfield area, were identified for additional investigation due to its proximity to the groundwater VOC plume described above. The SRs and SI were initiated in 2004. Both SR reports conclude that these sites do not appear to be sources contributing to the VOC plume. No further investigation under CERCLA authority is warranted at this time.

Also the SAU completed a SR Report of the Litton Systems site and integrated Preliminary Assessment/Removal Assessment (PA/RA) Reports of the Shipley Woodtreating site and Scrivner Farm site. A brief summary of the findings and recommendations for these sites is provided below.

The Litton Systems site (MOD007152903) is the location of a facility that manufactures printed circuit boards and uses metals and VOCs in its plating operations. The site was entered in the CERCLA Information System (CERCLIS), EPA's tracking record of potential hazardous waste

sites, on October 1, 1979. The department conducted several pre-remedial investigations from 1980 through1988, finding metals and solvent contamination on the site as well as TCE and methylene chloride in private wells and a nearby spring. To avoid Registry listing in November of 1991, Litton agreed to conduct remediation activities under a Consent Agreement with the state, which was finalized in 1993. The EPA then archived the site on September 29, 1993, since the site was actively undergoing remediation under a state agreement. However, in 2003, analytical results documented VOCs present in springs north of the site. Evidence of fracture systems from geophysical studies and dye traces led the department to determine that the Litton site was at least a contributor to the springs' contamination. The department requested EPA to de-archive the Litton site for further assessment under CERCLA authority.

The SR was initiated on November 7, 2003. The goal of the SR was to evaluate the threat posed to human health and the environment due to the historic releases of contaminants at the site. One objective of the SR was to further investigate off-site impacts to the groundwater and surface water pathways to determine the need for potential removal actions. A second objective was to re-evaluate the site under the Hazard Ranking System (HRS). The HRS score will determine if the site is eligible for placement on the National Priorities List (NPL). Sampling conducted as part of the SR shows impacts to shallow groundwater north and east of the Litton site. Two springs, Ritter West Spring (2-3 miles from the Litton site) and Williams Spring (3-4 miles from the Litton site), were impacted by TCE, the predominant VOC at the Litton site, above the Maximum Contaminant Level (MCL). Sediment samples collected at the emergence of these two springs showed copper at levels above EcoTox benchmark values. Copper is also a contaminant of concern at the Litton Systems site. Analytical results from the sampling of private residential wells three to four miles north-northeast of the Litton Systems site shows impacts from TCE. Of 105 wells sampled, 13 showed detectable levels of TCE. One well (DW-08) indicated levels exceeding MCLs.

Based on the data presented in this report, preliminary HRS scoring has been conducted. Litton Systems site would qualify for placement on the NPL based on a score of 28.5 or higher and further CERCLA action is warranted. However, as long as Litton continues to conduct remedial activities under the state Cooperative Program, further CERCLA actions are not being recommended at this time.

The Shipley Woodtreating Co. site is the location of a former woodtreating operation located near Dora, Missouri. The site was identified in October 2001 as part of a comprehensive, state-wide effort by the department's Hazardous Waste Program to locate former and active woodtreating sites in Missouri and to evaluate the potential hazards posed by these sites. A Pre-CERCLIS Site Screening was completed on September 16, 2002. Pentachlorophenol and dioxin were documented in soils on the site at levels significantly above background and health-based benchmarks. The site was recommended for entry onto CERCLIS and a PA/RA.

The objectives of the PA/RA were to delineate the extent of pentachlorophenol (PCP) contamination originating from the woodtreating operation and oversee cleanup activities conducted by the responsible party (RP). In October 2002, the RP submitted an official cleanup plan for the Shipley Woodtreating Site to the department. In November 2002, the department approved the plan with a few modifications and agreed to provide oversight of removal activities and conduct confirmatory sampling as part of an PA/RA investigation.

On April 10, 2003, the majority of contaminated soil, approximately 78 tons, was removed from the site and disposed of as special waste at the Black Oak Landfill in Hartville, Missouri. One 55-gallon drum of highly contaminated soil was disposed of as hazardous waste at the Chemical Waste Management facility in Emelle, Alabama. Department personnel observed the removal activities and collected confirmatory soil samples. Three samples showed PCP levels still above residential health-based cleanup values. Shipley Woodtreating then conducted further soil excavation, and in August 2003 additional confirmatory samples collected by the department showed levels of PCP to be below 2 parts per million (ppm). Based on current site conditions and sample results, there is no further action under CERCLA recommended for the Shipley Woodtreating site at this time.

The Scrivner Farm site is the location of a private farmstead where wood scraps treated with chromated copper arsenate (CCA) and PCP were discarded and burned. The wood scraps came from the Sentinel Wood Treating Co Inc. (Sentinel) site in Ava, MO (EPA ID Number MOD029684438). A removal action is currently being conducted at the Sentinel Site by the responsible party. A Site Screening investigation was completed on the Scrivner Farm Site on March 9, 2004. Arsenic was documented in surface soil on the site at levels significantly above background and health-based benchmarks. The site was recommended for entry onto CERCLIS and a PA/RA.

The objectives of the PA/RA were to delineate the extent of arsenic contamination originating from the wood scrap pile and determine whether any arsenic or PCP had migrated from the site into groundwater or surface water. The PA/RA was initiated on May 4, 2004. Investigation included site sampling on June 14, 2004. Forty-eight soil samples in total were screened with the XRF and arsenic levels ranged from 45 ppm to 5,040 ppm. The majority of the contamination to the east and west of the pile extending only 20 to 50 feet from the edge of the pile. A removal action is recommended for the Scrivner Farm site to address the CCA treated wood scrap pile and surrounding soil contaminated with elevated levels of arsenic. The Scrivner family is aware of the risk of exposure to the arsenic contamination and is avoiding the area. However, the arsenic contamination will not attenuate over time. Levels of arsenic far above health-based benchmarks and residential cleanup goals will remain posing a potential risk from exposure.

If you have any questions regarding these reports or need additional information, please do not hesitate to contact me at (573) 751-1087.

Sincerely,

HAZARDOUS WASTE PROGRAM

Julieann Warren

Julieann Warren, Chief
Site Assessment Unit
Superfund Section

JW:jc

Enclosures